



AMERICAN  
SPEECH-LANGUAGE-  
HEARING  
ASSOCIATION

Submitted via email to [NGS.lcd.reconsideration@anthem.com](mailto:NGS.lcd.reconsideration@anthem.com)

February 2, 2018

National Government Services, Inc.  
Medical Policy Unit  
Attention: Valerie Krushinsky - LCD Reconsideration Request  
P.O. Box 7108  
Indianapolis, IN 46207-7108

RE: NGS Local Coverage Determination for Speech-Language Pathology (L33580)

Dear Ms. Krushinsky:

On behalf of the American Speech-Language-Hearing Association, I am writing to request a reconsideration of the local coverage determination (LCD), entitled “Local Coverage Determination for Speech-Language Pathology (L33580),” because it fails to include several Current Procedural Terminology (CPT<sup>®</sup>) codes relevant to the practice of speech-language pathology.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 191,500 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students.

The LCD describes speech-language pathology services as “those services provided within the scope of practice of speech-language pathologists and necessary for the diagnosis and treatment of speech and language disorders, which result in communication disabilities and for the diagnosis and treatment of swallowing disorders (dysphagia), regardless of the presence of a communication disability.”

Unfortunately, none of the CPT<sup>®</sup> codes associated with swallowing evaluation or treatment are included in the LCD. As a result, speech-language pathologists attempting to bill for these services in your jurisdiction are receiving reimbursement denials. Instead, the LCD directs providers to use CPT<sup>®</sup> codes 92507, 92521, 92522, 92523, and 92524 to report patients with swallowing disorders as captured under ICD-10 codes R13.0, R13.10, R13.11, R13.12, R13.13, R13.14, and R13.19. The CPT<sup>®</sup> codes describe services related to speech, language, and voice disorders, but do not appropriately reflect the professional work and practice expense related to evaluation and treatment of swallowing disorders. Therefore, we request that you add the following CPT<sup>®</sup> codes to the LCD that will ensure coverage and reporting of swallowing services provided to Medicare beneficiaries.

**92526** Treatment of swallowing dysfunction and/or oral function for feeding

**92610** Evaluation of oral and pharyngeal swallowing function

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- 92611** Motion fluoroscopic evaluation of swallowing function by cine or video recording
- 92612** Flexible endoscopic evaluation of swallowing by cine or video recording;
- 92613** interpretation and report only
- 92614** Flexible endoscopic evaluation, laryngeal sensory testing by cine or video recording;
- 92615** interpretation and report only
- 92616** Flexible endoscopic evaluation of swallowing and laryngeal sensory testing by cine or video recording;
- 92617** interpretation and report only

Upon additional review of the LCD, ASHA noticed that the cognitive treatment code, G0515 (Cognitive skills development, each 15 minutes), is listed as a covered code, but the associated cognitive evaluation code, 96125 (Standardized cognitive performance testing, per hour) is also missing. It is critical for speech-language pathologists and Medicare beneficiaries to have access to evaluation services, when needed, to ensure appropriate identification of cognitive disorders. Therefore, we also request that you add CPT<sup>®</sup> code 96125 to the LCD.

Thank you for your review of our reconsideration request. If you or your staff have any questions, please contact Sarah Warren, MA, ASHA's director of health care regulatory advocacy, at [swarren@asha.org](mailto:swarren@asha.org).

Sincerely,



Elise Davis-McFarland, PhD, CCC-SLP  
2018 ASHA President